



U.S. Department of Energy
Office of River Protection

**P.O. Box 450
Richland, Washington 99352**

01-OSR-0148

Mr. Ron F. Naventi, Project Manager
Bechtel National, Inc.
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Naventi:

**CONTRACT NO. DE-AC27-01RV14136 – OFFICE OF SAFETY REGULATION (OSR)
COMMENTS ON BNI RESPONSE TO INSPECTION FOLLOW-UP ITEM REVIEW
INSPECTION REPORT IR-00-006**

- References:
1. BNI letter, CNN: 019348, from A. R. Veirup to W. J. Taylor, ORP, "Contract No. DE-AC27-01RV14136 - Bechtel National, Inc. Response to Office of Safety Regulation Comments on CHG Response to Inspection Follow-up Item Review Inspection Report IR-00-006," dated April 20, 2001.
 2. CHG letter, CNN 018701C, from J. O. Honeyman to W. J. Taylor, ORP, "Contract Number DE-AC27-99RL14047; Inspection Report IR-00-006, Inspection of Follow-up Item Review," dated February 28, 2001.
 3. DOE letter, 01-OSR-0029, from W. T. Taylor to M. P. DeLozier, CHG, "Inspection Report IR-00-006, Inspection Follow-up Item Review," dated February 13, 2001.

The OSR has reviewed the requested information in the BNI response (Reference 1 - a copy of which is enclosed) to the OSR letter (Reference 2) which evaluated CHG's response to Inspection Follow-up Item Review Inspection Report, IR-00-006 (Reference 3). Based on the review, the OSR concluded that BNI's response was acceptable. The OSR determined the corrective actions BNI proposed, if properly implemented, should address the Finding (IR-00-006-01-FIN).

The OSR noted that although BNI's specific response to the issue regarding changing records (Section C of BNI's Attachment 1 of the response) addressed BNI's current Quality Assurance Plan (QAP) requirement, it would not be acceptable once the OSR approves BNI's recent proposed revision to the QAP. As discussed during a meeting with your staff on April 17, 2001, the proposed QAP revision, commits BNI to follow NQA-1, 1989, which contains specific requirements for changing records that goes beyond what is currently described in procedure K13P020, "Project Records Management." A future revision to this procedure may be necessary to address these potentially new requirements.

Mr. Ron F. Naventi
01-OSR-0148

-2-

The OSR will verify your corrective actions during future inspection activities. Once the corrective actions have been verified, the OSR will close Finding IR-00-006-001-FIN. Nothing in this letter should be construed as changing the Contract (DE-AC27-01RV14136). If you have any questions, please contact me or Pat Carier, OSR, on (509) 376-3574.

Sincerely,

Robert C. Barr
Acting Safety Regulation Official
Office of Safety Regulation

OSR: JWM

Enclosure:
BNI Letter CCN 019348

cc w/encl:
D. A. Klein, BNI